

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<p><b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b></p> <p><b>THIS DOCUMENT RELATES TO:</b></p> <p><b>ETHICON ELECTION WAVE (PTO 298) CASES LISTED IN PLAINTIFFS' EXHIBIT A</b></p>	<p><b>Master File No. 2:12-MD-02327 MDL 2327</b></p> <p><b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b></p>
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**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF  
NICOLE FLEISCHMANN, M.D. FOR ELECTION WAVE**

Plaintiffs filed a Notice of Adoption (Doc. No. 7280) in the Election Wave (PTO 298) cases identified in Exhibit A to their Notice, adopting their Motion to Exclude or, in the Alternative, to Limit the Opinions and Testimony of Nicole Fleischmann, M.D., Doc. No. 2050/2051/2230. Defendants hereby adopt and incorporate by reference their prior *Daubert* response in Ethicon Wave 1, Case No. 2:12-md-02327, Doc. No. 2150 as their response for the Election Wave (PTO 298). Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1 response briefing.

Respectfully submitted,

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Counsel for Defendants

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage